

Unofficial Comment Form

Project 2020-04 Modifications to CIP-012

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2020-04 Modifications to CIP-012** by **8 p.m. Eastern, November 16, 2022**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Alison Oswald](#) (via email), or at 404-446-9668.

Background Information

In Order No. 866, FERC stated that “maintaining the availability of communication networks and data should include provisions for incident recovery and continuity of operations in a responsible entity's compliance plan.” FERC recognized that the redundancy of communication links cannot always be guaranteed, and acknowledged there should be plans for both recovery of compromised communication links and use of backup communication capability. The proposed scope of this project would entail modifications to CIP-012 – Communications between Control Centers.

The purpose of this project is to address a directive issued by the Federal Energy Regulatory Commission (FERC) in Order No. 866 to develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between the bulk electric system Control Centers.

Questions

1. The SDT revised CIP-012-1 R1 to address the comments received during previous ballots and to meet the directives outlined in FERC Order No. 866 seeking to provide for the availability of Real-time Assessment and Real-time monitoring data while in transit between Control Centers. Do you agree that the proposed language in R1 addresses the mitigation of risk as identified in FERC Order No. 866? If not please provide comments and suggested requirement language.

- Yes
 No

Comments:

2. Does the language in R1.2 adequately reflect the need to mitigate the loss of the ability to transmit Real-time Assessment and Real-time monitoring data? If not please provide comments and suggested requirement language.

- Yes
 No

Comments:

3. Does the language in R1.4 provide Responsible Entities with clarity on the need to identify physically or logically where they have applied the methods required in R1.1 and R1.2? If not please provide comments and suggested requirement language.

- Yes
 No

Comments:

4. The SDT received multiple requests to provide more possible mitigation methods. Do you agree that the expanded measures section of the standard adequately demonstrates examples of methods that could be used to mitigate the risk posed by loss of Real-time assessment and Real-time monitoring data while in transit?

- Yes
 No

Comments:

5. The SDT proposes that the modifications in CIP-012-2 meet the FERC directives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement

to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

6. The last ballot showed industry approval of the proposed 24-month implementation plan. Do you still agree the proposed timeframe is appropriate in light of the proposed revisions to the standard language? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Yes

No

Comments:

7. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale and implementation guidance document, if desired.

Comments: